

## UNITED STATES DISTRICT COURT

for the  
Western District of WashingtonIn the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)  
SUBJECT PREMISES, more fully described in  
Attachment A

Case No. MJ20-598

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 545	Smuggling goods into the United States.
18 U.S.C. § 5861(d)	Possession of unregistered firearms.
18 U.S.C. §§ 922(a)(1)(A), 922(g)(1)	Unlawfully engaging in the business of importing firearms; Felon in possession of firearms

The application is based on these facts:

- ☒ See Affidavit of HSI Special Agent Jill Peoples, continued on the attached sheet.

☐ Delayed notice of 90 days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

Applicant's signature

Jill Peoples, HSI Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 9/16/2020



Judge's signature

City and state: Seattle, Washington

Michelle L. Peterson, United States Magistrate Judge

Printed name and title

## AFFIDAVIT OF JILL PEOPLES

STATE OF WASHINGTON           )  
                                              )           SS  
COUNTY OF KING             )

I, Special Agent Jill Peoples, having been duly sworn, state as follows:

## INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent ("SA") with Homeland Security Investigations ("HSI"), United States Department of Homeland Security, and have been so employed since December 2003. I am a graduate of the Federal Law Enforcement Training Center ("FLETC") academy in Glynco, Georgia. I am currently assigned to the HSI Border Enforcement Security Task Force in Seattle, Washington, which is tasked with investigating violations of U.S. law involving contraband smuggling, trade fraud and financial crimes. Prior to my employment with HSI, I was a United States Probation Officer for approximately three years and was a Correctional Officer and Case Manager with the Bureau of Prisons for approximately three years.

2. During my career, I have participated in investigations and executed search warrants involving theft, fraud, money laundering, smuggling, import and export violations, counterfeit goods, crimes against persons and drug trafficking. Because of this training and experience, I am familiar with common methods of investigating import and export violations and have become familiar with how smuggling schemes work. This experience includes knowledge on how individuals unlawfully import, export, store and resell smuggled goods, how individuals use the U.S. postal system to move contraband and how those involved in contraband smuggling conduct financial transactions to facilitate smuggling activity. I am also familiar with the manner in which individuals illegally acquire and import firearms and firearm parts from foreign countries to the United States, and the unlawful resale and distribution of firearm and firearm parts within the United States.

1           3.     I make this affidavit in support of an application under Rule 41 of the  
2 Federal Criminal Rules of Procedure for a search and seizure warrant for the premises  
3 located at 23431 25th Ave S., Des Moines, Washington, as more specifically described in  
4 Attachment A (the "SUBJECT PREMISES").

5           4.     As discussed below, there is probable cause to believe that Camden Lamp,  
6 resides at the SUBJECT PREMISES, and has one or more firearms, along with  
7 documents and records of international purchases of firearms at the SUBJECT  
8 PREMISES. In addition, there is probable cause to believe that Lamp has imported a  
9 silencer, for delivery to the SUBJECT PREMISES.

10          5.     Camden Lamp is prohibited from possessing firearms due to prior felony  
11 convictions, to include a conviction in the Western District of Washington, *United States*  
12 *v. Camden Nicholas Lamp*, CR05-00030RSL, on February 15, 2006, for felon in  
13 possession of firearm, in violation of 18 U.S.C. § 922(g)(1), and possession of an  
14 unregistered shotgun, in violation of 26 U.S.C. §§ 5841, 5861, and 5871.

15          6.     I seek authorization to seize the items from the SUBJECT PREMISES that  
16 are described in Attachment B to this affidavit, which is incorporated herein by reference.

17          7.     The facts in this affidavit come from my personal observations, my training  
18 and experience, and information obtained from witnesses, other special agents, law  
19 enforcement officers, documents, open source and government databases. This affidavit  
20 contains the information necessary to support probable cause and does not contain every  
21 material fact that I have learned during the course of the investigation; however, no  
22 information known to me that would tend to negate probable cause has been withheld  
23 from this affidavit.

24          8.     Because this Affidavit is submitted for the limited purpose of establishing  
25 probable cause in support of the application for a search warrant, it does not set forth  
26 each and every fact that I, or others, have learned during the course of this investigation.  
27  
28



**RELEVANT LAW**

9. This Application requests the Court to authorize a search warrant at the SUBJECT PREMISES for evidence, instrumentalities, contraband, and fruits of violations of 18 U.S.C. § 922(g)(1), felon in possession of firearms, 18 U.S.C. § 545, smuggling goods into the United States, 26 U.S.C. § 5861(d), possession of unregistered firearms, 18 U.S.C. § 922 (a)(1)(A), unlawfully engaging in the business of importing or shipping firearms without a license, 18 U.S.C. § 922 (l), knowingly import into the United States any firearm or ammunition, and 18 U.S.C. § 922 (p) importing a firearm not detectable as the Security Exemplar.

10. Title 18, United States Code, Section 922(g)(1), prohibits the possession of firearms and ammunition by any person who has been convicted of a crime punishable by imprisonment for more than one year.

11. Title 18, United States Code, Section 545, prohibits fraudulently or knowingly importing or bringing into the United States, any merchandise contrary to law. Specifically, Section 545 states:

Whoever knowingly and willfully, with intent to defraud the United States, smuggles, or clandestinely introduces or attempts to smuggle or clandestinely introduce into the United States any merchandise which should have been invoiced, or makes out or passes, or attempts to pass, through the customhouse any false, forged, or fraudulent invoice, or other document or paper; or whoever fraudulently or knowingly imports or brings into the United States, any merchandise contrary to law, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise after importation, knowing the same to have been imported or brought into the United States contrary to law shall be fined under this title or imprisoned not more than 20 years, or both.

12. Title 26, United States Code, Section 5861(d), provides, "It shall be unlawful for any person...to receive or possess a firearm which is not registered to him in the National Firearms Registry and Transfer Record."

13. Title 18, United States Code, Section 921(a)(24), defines the terms "firearm silencer" and "firearm muffler" to mean any device for silencing, muffling, or

1 diminishing the report of a portable firearm, including any combination of parts, designed  
2 or redesigned, and intended for use in assembling or fabricating a firearm silencer or  
3 firearm muffler, and any part intended only for use in such assembly or fabrication.

4 14. Title 18, United States Code, Section 921(a)(3)(C), defines the term  
5 “firearm” to mean any “firearm muffler” or “firearm silencer”. Any device that meets the  
6 definition of “firearm silencer” or “firearm muffler” is subject to controls as defined in  
7 the National Firearms Act, 26 United States Code, Chapter 53. Under Title 26, United  
8 States Code, Section 5845(a), silencers are considered firearms.

9 15. Title 18, United States Code, Section 922 (a)(1)(A), provides that “It shall  
10 be unlawful for any person except a licensed importer, licensed manufacturer, or licensed  
11 dealer, to engage in the business of importing, manufacturing, or dealing in firearms, or  
12 in the course of such business to ship, transport, or receive any firearm in interstate or  
13 foreign commerce.”

14 16. Title 18, United States Code, Section 922(l), provides in part, “It shall be  
15 unlawful for any persons to import or bring into the United States or any possession  
16 thereof any firearm or ammunition; and it shall be unlawful for any person knowingly to  
17 receive any firearm or ammunition which has been imported or brought into the United  
18 States or any possession thereof.”

19 17. Title 18, United States Code, Section 922(p)(1), states, “It shall be unlawful  
20 for any person to manufacture, import, sell, ship, deliver, possess, transfer, or receive any  
21 firearm—(A) that, after removal of grips, stocks, and magazines, is not detectable as the  
22 Security Exemplar, by walk-through metal detectors calibrated and operated to detect the  
23 Security Exemplar . . .”

24 18. Title 18, United States Code, Section 922 (p)(2)(C)(i), defines the term  
25 “Security Exemplar” to mean an object, to be fabricated at the direction of the Attorney  
26 General, that is constructed of 3.7 ounces of material type 17-4 PH stainless steel in a  
27 shape resembling a hand-gun.  
28



**SUMMARY OF INVESTIGATION****A. Seized Parcel**

19. On August 7, 2020, Custom and Border Patrol Officers (CBP) at incoming international mail facility in the San Francisco International Airport in California, inspected a parcel arriving from China. The shipping address on the parcel was “Eric jiang, No.419 gongyue rd, baoshan district, Shanghai, Shanghai, 201901, China,” and the consignee was Camden Lamp, located at “23431 25TH AVE S, DES MOINES WASHINGTON 98198, UNITED STATES”. This delivery address is the SUBJECT ADDRESS.

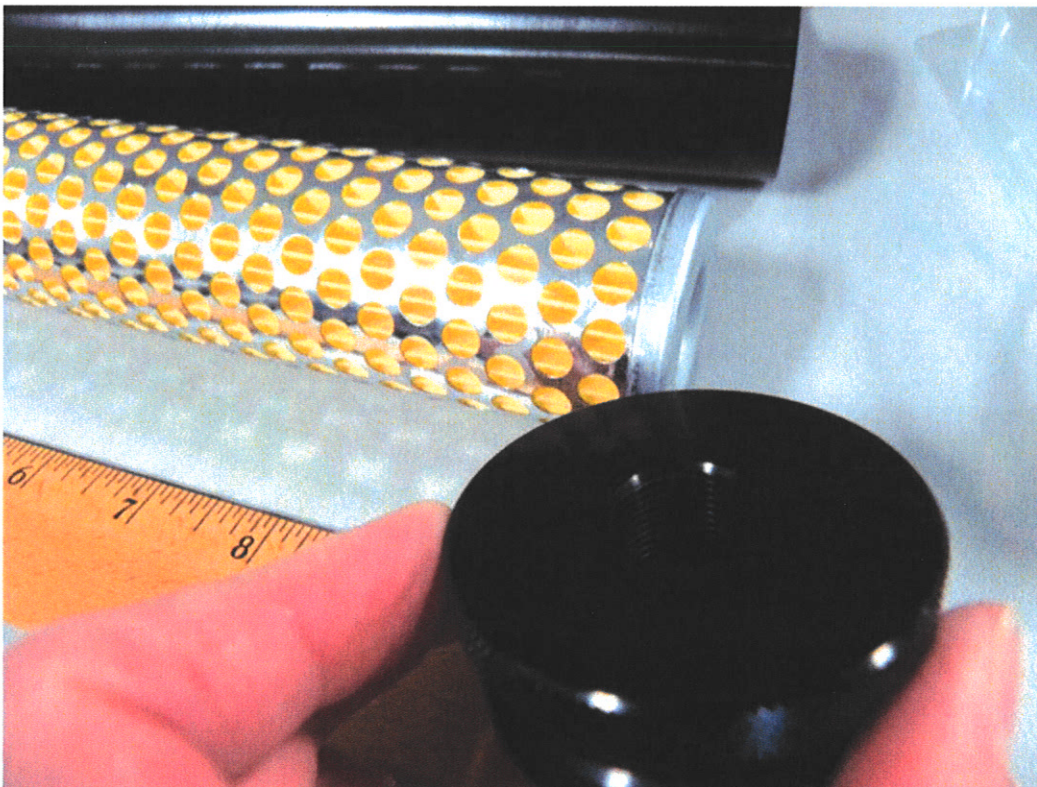
20. The parcel label stated it contained a fuel filter. The shipping weight of this parcel was 0.4 kilograms. The declared value of the package was \$2. CBP Officers examined the contents of the parcel and determined the item to be consistent, in function and with the components, with that of a firearm silencer not a fuel filter. A fuel filter is an item designed to allow fluid to pass through a permeable infrastructure which would allow for the filtering of fine particulate matter. The appearance and use of a fuel filter is distinctly different than a firearm silencer.

21. I have consulted with firearm experts with the Bureau of Alcohol, Tobacco, and Firearms (ATF), including ATF Special Agent (SA) Claudia Grigore. Based on my training and experience, and consultations with ATF experts, companies in China often advertise these silencers as car parts or toys to mask the item and actual intended use, and to enable smugglers to conceal the true nature of the commodity from customs inspectors.

22. Markings on the box label for the parcel addressed to Camden Lamp appears to indicate the size of the National Pipe Threads for the silencer. The silencer is labeled 5/8 x 24, which according to ATF Bulletin 20-01 would fit a variety of rifles to include .308, .30, UZI Carbine, Ruger Mini 30, AR-10, M14, 300 Blackout, and an AR-15.

23. I received the parcel with silencer on August 19, 2020. The below are photographs of the silencer:





AFFIDAVIT OF JILL PEOPLES - 6  
USAO 2020R00865

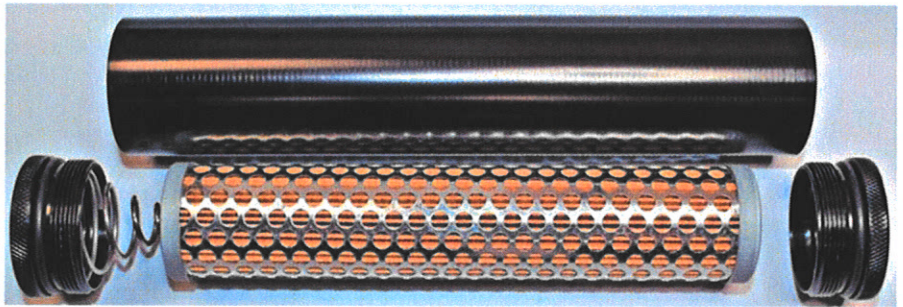
UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970





24. SA Grigore has received specialized training on firearms, which includes training on silencers. I have also reviewed ATF Firearms & Ammunition Technology Division Technical Bulletin 20-01 of October 30, 2019, (ATF Bulletin 20-01) concerning components of a silencer. SA Grigore and I have examined the item in the parcel addressed to Camden Lamp, and based on my training and experience, and consultation with SA Grigore, the parcel contains all the components to be a silencer, including baffles and marked points for simple machine work, assembly, and adaptation. These components are noted in ATF Bulletin 20-01 as components for a silencer. The silencer pictured in ATF Bulletin 20-01 is as follows, and is similar to the silencer in the seized parcel:





**B. Camden Lamp and Anita Kaufman**

25. I believe that the parcel's listed addressee, Camden Lamp at the SUBJECT PREMISES, is Camden Nicholas Kennedy Lamp, with date of birth of January 30, 1977. According to public record databases, Camden Lamp is married to Anita Kaufman, and they reside at the SUBJECT PREMISES. Lamp is employed with Fleetpride, a truck and trailer parts store. A truck with the Fleetpride logo has been observed by agents parked in the driveway of the SUBJECT PREMISES. There is a large star with the name, "LAMP", in the center of it hanging in the front window of the SUBJECT PREMISES.

26. According to Washington State Department of Licensing, Camden Lamp, Anita Kaufman, and Brenda Stauffer all have driver's licenses and vehicles registered to the SUBJECT PREMISES. I do not know the relationship of Brenda Stauffer to Lamp and Kaufman, and she may also reside at the SUBJECT PREMISES.

27. Camden Lamp is prohibited under federal law from possessing firearms and ammunition. Anita Kaufman and Brenda Stauffer are not prohibited under federal law from possessing firearms and ammunition. None of them have any firearms registered in the National Firearms Transfer Record, including silencers, nor do any of them possess a Federal Firearms License or are they licensed by the federal government to be in the business of importing or selling firearms in the United States.

28. According to law enforcement criminal records databases, Camden Lamp has the following prior felony convictions:

- a. Felon in possession of firearm (18 U.S.C. § 922(g)(1), and possession of an unregistered shotgun, (26 U.S.C. §§ 5841, 5861, and 5871), *United States v. Camden Nicholas Lamp*, Case Number CR05-

00030RSL, United States District Court, Western District of Washington, February 15, 2006, sentenced to 48 months of imprisonment and three years of supervised release;

b. Burglary First Degree, *State v. Lamp*, Case Number 03-109706-0, King County Superior Court, August 19, 2005, sentenced to 36 months of imprisonment and 18 months of probation;

c. Burglary Second Degree, *State v. Lamp*, Case Number 96-1-01999-9, King County Superior Court, sentenced to three months of imprisonment and 12 months of community custody;

d. Taking Motor Vehicle without Permission, *State v. Lamp*, Case Number 95-1-07266-2, King County Superior Court, sentenced to 30 days imprisonment and 12 months of community custody.

29. The prior federal felony conviction involved Lamp's unlawful possession of the following firearms: one Sendra Corp .223 caliber rifle, one Winchester 12 gauge shotgun, one Rossi .357 caliber handgun, one Intertec 9 mm handgun, one Hi-point 9mm carbine rifle (with no serial number) and a Winchester 12 gauge shotgun with a barrel of less than 18 inches long.

30. Camden Lamp's employer, according to Washington State Employment Security Department, is Fleetpride, a nationwide chain of stores that sell truck and trailer parts. Some locations also offer repairs and maintenance for trucks. Lamp's employment with an automotive parts and repair business should make him familiar with genuine automotive and truck parts.

**C. Prior international packages**

31. As part of this investigation, I have discovered through law enforcement database queries that other parcels with similar details were delivered to Camden Lamp. Since May 10, 2020, three other international packages, originating from China, have been sent to Lamp at the SUBJECT PREMISES. The manifests for these three packages indicated that they contained "lock, fixture, and underwear".



1       32. On August 17, 2020, a package from China, with the sender name of Eric  
2 Jiang and address of "No.419 gongyue rd, baoshan district, Shanghai, Shanghai, 201901,  
3 China", addressed to Camden Lamp was delivered to the SUBJECT PREMISES. It was  
4 manifested as a "lock" and weighed .443kg with a declared value of \$2. This August  
5 shipment originated from the same sender as the sender for the seized parcel, and I  
6 believe may have contained a firearm silencer.

7       33. During my open source research of how to purchase silencers online from  
8 China, many of silencers were found on internet sites list fuel filters or other vehicle  
9 parts, but actually sell silencers. All of the sites required electronic payment, often via  
10 PayPal. Contact is limited to email or a contact form, and only in one instance, could I  
11 find a listed phone number for the business. Otherwise all orders and payment for orders  
12 had to be made online.

#### 13                                   BASIS OF KNOWLEDGE

14       34. Based on my training, education, experience and discussion with other  
15 local, state, and federal law enforcement officers, I know:

16           a. To use a silencer or firearm suppressor for its intended purpose, a  
17 person must possess a firearm. The national pipe tapered threads are different for  
18 different firearms. A person would order a silencer with national pipe tapered  
19 threads to fit a weapon they already have.

20           b. A person interested in silencers will also be knowledgeable about  
21 firearms and own a variety of firearm accessories, parts, and ammunition.

22           c. Persons use digital devices to place orders online for silencers. They  
23 often communicate with the online sellers and shippers via online communication  
24 platforms to include e-mail, instant messaging services, text messaging services  
25 and encrypted communication platforms. As a result, evidence of smuggling of  
26 silencers can be located in emails, text messages, online accounts, and other data  
27 that is stored on cellphones and other electronic devices. The order information is  
28 maintained in digital or electronic format to facilitate postal tracking of the order

1 and to make future orders. People that order merchandise online have it shipped  
2 to themselves at their home address.

3 d. Records of purchases and resale are often maintained on digital  
4 devices, to include computers, laptops, cell phones, iPads, and other similar  
5 devices. These records may also be maintained in hard copy paper files, ledgers,  
6 logs, or books.

7 e. Persons who order merchandise online use electronic methods of  
8 payments linked to the purchaser, including Paypal. These records of electronic  
9 payments will be maintained on their digital devices.

10 f. Persons involved in smuggle goods, including silencers, into the  
11 United States often smuggle more than one shipment of contraband into the United  
12 States.

13 g. Persons who typically possess and own silencers will store their  
14 silencers and other firearms in their personal residence and other buildings on their  
15 property.

#### 16 DESCRIPTION OF SUBJECT PREMISES

17 35. Attachment A provides a description of the SUBJECT PREMISES. I have  
18 conducted surveillance of the SUBJECT PREMISES and know that it is a two - story  
19 residence located at 23431 25th Avenue South, Des Moines, Washington. The color of  
20 the house is pale yellow with white trim. The house numbers, 23431, are visible on the  
21 house next to the front door. In the large front window of the house are three signs. One  
22 sign is a large five pointed star with the name, LAMP, in the center. There is a driveway  
23 leading down to a single-story garage door in the lower level of the house. In the  
24 backyard is a small light tan outbuilding with white trim. It has two glass French doors.

25 36. On September 2, 2020, law enforcement installed a pole camera with live  
26 feed facing the residence to maintain active surveillance. SA Grigore observed the live  
27 feed from the pole camera on September 15, 2020, and also, the morning of September  
28 16, 2020. During her observations, she saw Camden Lamp leave the residence in his



1 Fleetpride truck in the early morning hours between 6:45 to 7:15 a.m., and return to the  
2 residence between 5:00 p.m. and 6:00 p.m. Similarly on the morning of September 16,  
3 2020, SA Grigore observed Lamp leave his residence in his Fleetpride truck during early  
4 morning hours.

5 37. According to public records searches, Camden Lamp and Raymond and  
6 Melinda Lamp purchased the SUBJECT PREMISES on May 24, 2011. I do not know  
7 the specific relationship of Camden Lamp with Raymond and Melinda Lamp. According  
8 to Washington State Department of Licensing records, Raymond and Melinda Lamp  
9 currently have licenses and vehicles registered to a separate address in Seattle,  
10 Washington.

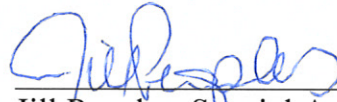
11 38. I am requesting authority to search the main residence, the garage, the  
12 outbuilding, any other outbuildings, and the entirety of the property for the items listed in  
13 Attachment B, Items to be Seized.

14 39. For these reasons, I believe that Camdem Lamp resides at the SUBJECT  
15 PREMISES.

#### 16 CONCLUSION

17 40. Based on the foregoing, there is probable cause to believe that at the  
18 SUBJECT PREMISES, there is evidence, instrumentalities, contraband, and fruits of  
19 violations of 18 U.S.C. § 922(g)(1), felon in possession of firearm, 18 U.S.C. § 545,  
20 smuggling goods into the United States, 26 U.S.C. § 5861(d), possession of unregistered  
21 firearms, 18 U.S.C. § 922 (a)(1)(A), unlawfully engaging in the business of importing or  
22 shipping firearms without a license, 18 U.S.C. § 922 (l), knowingly import into the  
23 United States any firearm or ammunition, and 18 U.S.C. § 922 (p) importing a firearm  
24 not detectable as the Security Exemplar. I therefore respectfully request that this Court  
25  
26  
27  
28

1 issue a warrant authorizing the search of the SUBJECT PREMISES as further described  
2 in Attachment A for the search and seizure of the items more specifically described in  
3 Attachment B.

4  
5  
6 

Jill Peoples, Special Agent  
Homeland Security Investigations

7  
8  
9 The above-named agent provided a sworn statement attesting to the truth of the  
10 foregoing affidavit by telephone on the 16th day of September, 2020.

11  
12 

MICHELLE L. PETERSON  
United States Magistrate Judge



## ATTACHMENT A

### Premises to be searched

The SUBJECT PREMISES is more fully described as: a two - story residence located at 23431 25th Avenue South, Des Moines, Washington 98198. The color of the house is pale yellow with white trim. The house numbers, 23431, are visible on the house next to the front door. In the large front window of the house are three signs. One sign is a large five pointed star with the name, LAMP, in the center. There is a driveway leading down to a single-story garage door in the lower level of the house.

In the backyard is a small light tan outbuilding with white trim. It has two glass French doors.

Photographs from public records and surveillance for the SUBJECT PREMISES:







**Attachment B**

**ITEMS TO BE SEIZED**

All documents, records, images, and items reflecting evidence, contraband, fruits, and instrumentalities of the commission of the following crimes: 18 U.S.C. § 545, smuggling goods into the United States, 18 U.S.C. § 922(g) (1), felon in possession of a firearm, 26 U.S.C. § 5861(d), possession of unregistered firearms, 18 U.S.C. § 922 (a)(1)(A), unlawfully engaging in the business of importing or shipping firearms without a license, 18 U.S.C. § 922 (l), knowingly import into the United States any firearm or ammunition, and 18 U.S.C. § 922 (p) importing a firearm not detectable as the Security Exemplar.

1. Any silencers, firearms mufflers, and suppressors;
2. Any firearms, ammunition, parts, and indicia of firearms relating to silencers, firearms mufflers, and suppressors;
3. Any documents, packaging materials, or receipts related to the importation of silencers or firearm suppressors, or similar devices, from China or other countries, including but not limited to manifests, invoices, billing statements, postage, labels, and receipts.
4. Any and all documentation relating to the ownership and occupancy of the SUBJECT PREMISES described in Attachment A, including mortgage documents, title records, utilities records, and records of payments.
5. Any financial records associated with Camden Lamp to include business and personal checks, financial institution account statements, deposit and withdrawal and ATM slips, and credit/debit card slips and statements, which may be evidence of payment of silencers, firearm suppressors, and similar devices.
8. Any and all documents and tangible items relating to any means of identification (real or fraudulent) to include passports, birth certificates, drivers licenses, applications, forms, letters and stationary in the name of Camden Lamp for the purpose of indicia of occupancy at the SUBJECT PREMISES as further described in Attachment A.

**Digital Devices to be Seized Only**

Agents will seize and/or image on-site any digital devices located at the SUBJECT PREMISES. Agents *will not* search the digital devices pursuant to this warrant. Any seized digital devices will be returned to Camden Lamp and Anita

Kaufman within two weeks unless an application for search warrant to search the digital devices for evidence of the crimes listed above is submitted within that time period, a request to extend the date for the return of any seized devices is authorized by the Court, or consent is provided by Camden Lamp to seize and retain digital devices based on consent to search authorized by Camden Lamp.

9. Any and all digital devices to include but not limited to computer hardware, computer software, laptops, cellular phones, smart phones, direct connect devices and their contents to include SIM cards, memory cards and other internal storage devices, and computer password and data security devices.

a. Computer hardware is described as any and all computer equipment, including any electronic devices which are capable of collecting analyzing, creating, displaying, converting, storing, concealing or transmitting electronic, magnetic, optical or similar computer impulses or data. These devices include, but are not limited to any data processing hardware (such as central processing units, memory typewriters and self-contained "laptop" or "notebook" computers); internal and peripheral storage devices (such as fixed disks, external hard disks, floppy disks and diskettes, tape drives and tapes, optical storage devices, and other memory storage devices); peripheral input/output devices (such as keyboards, printers, scanners, plotters, video display monitors and optical readers); and related communication devices (such as modems, cables and connections, recording equipment, RAM and ROM units, acoustic couplers, automatic dialers, speed dialers, portable telephone dialing or signaling devices and electronic tone generating devices); as well as any devices, mechanisms or parts that can be used to restrict access to such hardware (such as physical keys or locks).

b. Computer software is described as any and all information, including instructions, programs, or program code stored in the form of electronic, magnetic, and optical or other media which are capable of being interpreted by a computer or its related components. Computer software may also include certain data, data fragments or control characters integral to the operation of computer software. These items include but are not limited to operating system software, applications software, utility programs, compilers, interpreters, communications software and other programming used or intended for use to communicate with computer components.

c. Computer passwords and data security devices are described as all those devices, programs or data – whether themselves in the nature of hardware or software – that can be used or is designed for use to restrict access to or facilitate concealment of any computer hardware, computer



software, computer related documentation, electronic data, records, documents or materials within the scope of this application. These include but are not limited to any data security hardware (such as encryption devices, chips and circuit boards), passwords, data security software or information (such as test keys and encryption codes), and similar information that is required to access computer programs or data to otherwise render programs or data into a usable form.